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8 Attorneys for Defendants
9 THE GLIDDEN COMPANY, d/b/a ICI PAINTS

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12 IN THE UNITED STATES DISTRICT COURT
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14 FOR THE DISTRICT OF ALASKA

15 MICHAEL INVESTMENTS, LLC,

16 Plaintiff,

17 Case No.: 3:05-cv-0223 CV (TMB)

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19 vs.
20 THE GLIDDEN COMPANY, d/b/a ICI
21 PAINTS,

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28 **UNOPPOSED MOTION FOR
EXTENSION OF DISCOVERY
DEADLINES**

Defendants.

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28 Defendant The Glidden Company, d/b/a ICI Paints (ICI), hereby moves to extend
the discovery-related deadlines listed below. Counsel for Defendant ICI is preparing for
a trial in another matter that is scheduled to begin in late July and to last until late
August. ICI is in the process of identifying a testifying expert regarding paint adhesion
and/or composition, and the parties have not yet completed other fact discovery but will
do so by the dates set forth below. Counsel for Plaintiff Michael Investments, LLC, has
authorized Defendant's counsel to represent that his client does not oppose this motion.

- 1 • The final revised witness list is currently due on June 29, 2006. ICI
2 moves for an extension so that the final revised witness list will be
3 due on Tuesday, July 25, 2006.
- 4 • Expert witness disclosures in accordance with Federal Rule of Civil
5 Procedure 26(a)(2) are currently due on August 14, 2006. ICI
6 moves for an extension so that these disclosures will be due on
7 October 13, 2006.
- 8 • All discovery is scheduled to be completed by August 28, 2006. ICI
9 moves for an extension so that all discovery will be completed by
10 October 27, 2006.

10 DATED: June 29, 2006

11 Respectfully submitted,

12 HELLER EHRLMAN LLP

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14 By s/James E. Torgerson.
15 JAMES E. TORGERSON (Bar No. 8509120)
16 Attorneys for Defendant THE GLIDDEN
17 COMPANY, d/b/a ICI PAINTS

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2 **[PROPOSED] ORDER**

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4 It is hereby ORDERED that Defendant ICI's unopposed motion to extend
 5 discovery deadlines is GRANTED and that:

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- 7 • The final revised witness list is hereby due on or before July 25,
 8 2006.
- 9 • Expert witness disclosures in accordance with Federal Rule of Civil
 10 Procedure 26(a)(2) are hereby due on or before on October 13, 2006.
- 11 • All discovery will hereby be completed on or by October 27, 2006.

12 DATED this _____ day of _____, 2006.

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TIMOTHY M. BURGESS
 16 U.S. District Court Judge

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19 **CERTIFICATE OF SERVICE**

20 This is to certify that a true and correct copy of
 21 the foregoing UNOPPOSED MOTION FOR
 22 EXTENSION OF DISCOVERY DEADLINES has been served
 23 electronically this 29th day of June, 2006, to:

24 David H. Shoup
 25 TINDALL BENNETT & SHOUP, PC
 26 508 W. 2nd Ave., 3rd Floor
 27 Anchorage, AK 99501
 28 Facsimile: (907) 278-8536

29 s/James E. Torgerson

30 James E. Torgerson

31 SE 2167958 v1
 32 6/29/06 4:56 PM (42647.0001)